

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

SHEA WHITEHURST,

*Plaintiff,*

v.

LIBERTY UNIVERSITY, INC., and  
CHARLES TIPPETT

*Defendants.*

Case No.: 6:21-cv-00059-NKM-RSB

**PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE AN AMENDED  
COMPLAINT AND CORRECT A SCRIVENER’S ERROR**

COMES NOW, the Plaintiff, Shea Whitehurst (“Plaintiff”), by and through counsel, and hereby requests that her Amended Complaint be accepted by the court. Because the court ordered her to file an Amended Complaint in her own name, she requests further leave to amend her complaint to correct a scrivener’s error in her initial Complaint. In support of her motion, Plaintiff states:

1. On September 30, 2022, this court ordered the Plaintiff to file an Amended Complaint in her name or file a dismissal (Dkt. 43). The Plaintiff has opted to file an Amended Complaint as permitted by this Order. *Id.*

2. The initial Complaint in this matter (Dkt. 1) contained a scrivener’s error in paragraph 40. That paragraph stated, “eleven weeks” when it should have stated, “seven weeks.” The incorrect number was due to a scrivener’s error. The Amended Complaint corrects the error.

3. Plaintiff added her name to the Amended Complaint (filed separately today) and seeks leave to correct the error identified above, changing “eleven” to “seven” in paragraph 40. No other substantive changes were made.

4. Both Defendants' respective counsel of record has confirmed no opposition to this motion for leave file an Amended Complaint to correct the error. Plaintiff respectfully seeks leave to make the correction and files herewith a proposed order granting this motion.

5. In light of the unopposed nature of the motion, and the change proposed, the Plaintiff respectfully waives further briefing or hearing on this motion.

Dated: October 14, 2022

Respectfully submitted,

/s/ Grace Williams

Grace Williams, VSB No. 88103

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**FH+H**

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 14, 2022, the forgoing was served on all counsel of record in this matter via the court's electronic filing (ECF) system.

/s/ Grace Williams  
Grace Williams, Esq.